

IN RE: Anna-Marie C. Christian, Debtor

Chapter 13
Case# 14-35373

Citimortgage
v.

Anna-Marie C. Christian

**Answer to Motion of Citimortgage
For Relief from Automatic Stay**

COMES NOW the Debtor Anna-Marie C. Christian by counsel, Pia J. North, Esq. and answers as follows:

1. Debtor admits the allegations contained in Paragraphs 1-5 of the plaintiff's motion.
2. Debtor does not have sufficient information to either admit or deny allegations other than those paragraphs specified previously. As such, all allegation not specifically admitted are presumed to be denied and the Debtor demands strict proof thereof.
3. The Debtor's possession of the property is necessary for the effective reorganization of the estate.
4. Movant has not shown the irreparable harm necessary to justify lifting the stay. Even if Movant is entitled to relief from the stay, the stay should not be terminated. The Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, the Debtor prays that the plaintiff's motion be dismissed, that the Debtor be allowed an opportunity to bring the account current; and that the Debtor be granted all other relief as this Court deems just and proper as well as the right to enlarge and or modify the response to the motion if necessary.

Respectfully Submitted:
Anna-Marie C. Christian

By: /s/ Pia J. North
Pia J. North, Esq. #29672
North Law
5913 Harbour Park Drive
Midlothian, VA 23112
(804) 739-3700

CERTIFICATE OF SERVICE

I hereby certify that on 6/26/2015, I served by ECF or mailed the foregoing document by electronic mail or first class mail, postage pre-paid to the United States Trustee at 701 E. Broad Street, Room 4304, Richmond, VA 23219; the trustee, Suzanne E. Wade P.O. Box 1780, Richmond, VA 23218; and attorney for Citimortgage.

/s/ Pia J. North,
Pia J. North